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16 Attorneys for Defendants FREMANTLE
17 PRODUCTIONS NORTH AMERICA, INC. and
18 MARATHON PRODUCTIONS, INC.

19 **UNITED STATES DISTRICT COURT**

20 **DISTRICT OF NEVADA**

21 RUSSEL G. GREER,

22 Plaintiff,

23 v.

24 FREMANTLE PRODUCTIONS NORTH
25 AMERICA, INC, a corporation and
26 MARATHON PRODUCTIONS, INC, a
27 corporation,

28 Defendants.

Case No. 2:21-cv-01905-RFB-NJK

Judge Richard F. Boulware, II

Magistrate Judge Nancy J. Koppe

**STIPULATION AND [PROPOSED]
ORDER TO EXTEND TIME TO
RESPOND TO AMENDED MOTION
FOR PRELIMINARY INJUNCTION
[ECF NO. 52]**

1 Plaintiff Russell G. Greer (“Greer”), in pro per person, and Defendants Fremantle
2 Productions North America, Inc. and Marathon Productions, Inc. (collectively, “Fremantle”), by
3 and through counsel, hereby agree and stipulate as follows:

4 WHEREAS, on January 28, 2022, Greer filed an Amended Motion for a Preliminary
5 Injunction (the “PI Motion”), *see* Dkt. 27;

6 WHEREAS, on February 3, 2022, Fremantle and Greer stipulated that—for party and
7 judicial efficiency—Fremantle should not oppose the PI Motion until and unless the Court
8 denies Fremantle’s currently pending Motion to Compel Arbitration and that Fremantle should
9 have at least two weeks from such order to oppose the PI Motion in such event, *see* Dkt. 30;

10 WHEREAS, on February 8, 2022, the Court granted the Parties’ stipulation, *see* Dkt. 37;

11 WHEREAS, on May 18, 2022, Greer filed a further Amended Motion for a Preliminary
12 Injunction (the “Amended PI Motion”), Dkt. 52;

13 WHEREAS, Fremantle and Greer agree that the Parties’ prior stipulation and the Court’s
14 February 8, 2022 Order should apply with equal force to the Amended PI Motion;

15 WHEREAS, Fremantle and Greer further agree that Fremantle should not oppose the
16 Amended PI Motion until and unless the Court denies Fremantle’s currently pending Motion to
17 Compel Arbitration and that Fremantle should have at least two weeks from such order to
18 oppose the Amended PI Motion in such event;

19 WHEREAS, the Parties otherwise reserve all rights.

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Dated this 23rd day of May 2022.

RUSSELL G. GREER

/s/ Russell G. Greer

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Pro Se Litigant

Dated this 23rd day of May 2022.

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Attorneys for Defendants

IT IS SO ORDERED:

UNITED STATES DISTRICT JUDGE

Dated: _____